

Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty

DE 22-060

Consideration of Changes to the Current Net Metering Tariff Structure, Including Compensation  
of Customer-Generators

New Hampshire Public Utilities Commission Record Request 2

Subject: Net Metering

Date Request Received: 11/25/24

Request No: RR 2

Date of Response: 1/21/25

Respondent: Robert Garcia

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**RECORD REQUEST:**

In a live Excel file, while affording necessary privacy protection for the public version, please provide a list of all customer-generators currently enrolled in your company's net-metering program. The list should include the following data:

- a. The billing address and name of the customer on the billing statement.
- b. Whether the customer-generator is a residence or a business.
- c. The date the customer-generator enrolled in your company's net-metering program.
- d. The peak generating capacity of the customer-generator.
- e. Whether the customer-generator is categorized as small or large.
- f. The number of plots of land on which the customer-generator maintains its facilities.
- g. For all customer-generators receiving any net-metering credits for the full year between July 1, 2023 and June 30, 2024, provide that customer-generator's total consumption per month in kWh for each of the twelve months.
- h. For all customer-generators receiving any net-metering credits for the full year between July 1, 2023 and June 30, 2024, provide that customer-generator's total production per month in kWh for each of the twelve months.
- i. For all customer-generators receiving any net-metering credits for the full year between July 1, 2023 and June 30, 2024, provide the net-metering credits or debits, in dollars and kWh, attributed to that customer per month for each of the twelve months.

**RESPONSE:**

- a. See "Attachment DE 22-060 RR-2.xlsx".
- b. See "Attachment DE 22-060 RR-2.xlsx".
- c. This data is not available in the Company's information systems.
- d. This data is not available in the Company's information systems.
- e. See "Attachment DE 22-060 RR-2.xlsx".
- f. The Company does not record this information.
- g. See "Attachment DE 22-060 RR-2.xlsx".
- h. See "Attachment DE 22-060 RR-2.xlsx".
- i. See "Attachment DE 22-060 RR-2.xlsx".

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DE 22-060

Consideration of Changes to the Current Net Metering Tariff Structure, Including Compensation  
of Customer-Generators

New Hampshire Public Utilities Commission Record Request 11

Subject: Net Metering

Date Request Received: 11/25/24

Request No: RR 11

Date of Response: 1/21/25

Respondent: Robert Garcia

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**RECORD REQUEST:**

If the netting is changed to hourly netting for small customer-generators for the energy component, please explain what changes the utilities will need to make to the metering infrastructure and estimate the cost to implement each change. Also explain what changes will be required if the netting for small customer-generators for the energy component is changed to five-minute netting.

**RESPONSE:**

In order to implement either hourly or instantaneous (i.e., five-minute interval) netting, Liberty would incur costs associated with meter installations and the initial conversion of the metering infrastructure, as well as ongoing support. The following are Liberty's preliminary estimates, which are subject to change based on final requirements.

Assuming the installation of 2,000 cellular meters, which take significantly more time for the meter technician to set up, Liberty estimates that about 6,000 labor hours would be required and a total installation cost of approximately \$300,000 (i.e., about 3 hours per meter between back office setup and actual installation at roughly \$50.00 per hour equals roughly \$150.00 per exchange, times 2,000 meters). This does not include the cost of the meters themselves, which is expected to cost over \$350 per meter.

In addition, Liberty's Meter Data and Billing Department will incur manual work to convert the accounts to the new meter. See the estimated steps and associated costs below.

	Initial Process for approximately 2,000 meters	Cost to implement
1	Coordination with Field, Meter Data and Billing to identify an exchange	\$ 80,000.00
2	Billing analysts to perform the meter exchange manually	\$ 40,000.00
2	Note the date of the exchange and ensure connectivity to MV90 (initial inbound connection, outbound connection)	\$ 80,000.00
3	Determine the parameters for the upcoming long/short invoice to accommodate the move to Cycle 21 billing	\$ 80,000.00

4	Perform the custom data export from MV90 for initial long/short invoice and post to SAP	\$ 40,000.00
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\$320,000.00

With respect to ongoing costs, Liberty estimates that unless this conversion occurs as part of an AMI meter deployment, at least one additional FTE would be necessary to perform a daily review of connectivity, field coordination for issues, periodic upkeep, and exchanges that will need to be performed. The ongoing costs of an additional analyst would be approximately \$125,000 per year, including benefits.

Changes to the billing system would also be required in implementing either hourly or instantaneous netting. Assuming that the netting would utilize ISO-New England market prices, the following are the required changes and associated costs related to SAP and the related interfaces to implement meters, whether set to hourly or five-minute intervals initially:

	Description	Cost to implement
1	Interface to obtain the real-time-price or spot price data in SAP from ISO	\$ 98,280.00
2	Interface to obtain interval data into SAP	\$ 98,280.00
3	Conversion of normal meters to interval meters and account set up with interval rates	\$ 82,680.00
4	RTP interface, RTP formula, and RTP rates configuration	\$ 82,680.00
5	Provision for custom formula requirement	\$ 51,480.00
6	Profile configuration and conversion of data to set up profiles for interval data	\$ 51,480.00
7	MV90 System Enhancement	\$ 150,000.00
		\$ 614,880.00

The following are the changes and associated costs if the initial configuration is hourly and then is later switched to instantaneous netting.

	Description	Cost to implement
1	Interface to obtain the real-time-price or spot price data in SAP from ISO	\$ 28,080.00
2	Interface to obtain interval data into SAP	\$ 43,680.00
3	Conversion of normal meters to interval meters and account set up with interval rates	\$ 82,680.00
4	RTP interface, RTP formula and RTP rates configuration	\$ 35,880.00
5	Provision for custom formula requirement	\$ 28,080.00
6	Profile configuration and conversion of data to set up profiles	\$ 51,480.00
		\$ 269,880.00

Liberty believes that it would not be economic to implement either hourly or instantaneous netting absent an AMI meter deployment. The incremental benefits of including such use cases, along with other TOU rate offerings, should be explored as part of any future consideration of AMI meter deployment.